

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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SKANGA ENERGY & MARINE LIMITED,	:	
	:	
Plaintiff,	:	Case 1:11-cv-04296-DLC
	:	ECF CASE
v.	:	
AREVENCA S.A., PETRÓLEOS DE	:	NOTICE OF MOTION
VENEZUELA S.A., and JAVIER GONZALEZ	:	FOR STAY OF PROCEEDINGS
ALVAREZ	:	PENDING APPEAL
Defendants.	:	
	:	

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**PLEASE TAKE NOTICE** that upon the accompanying Memorandum of Law, Defendant Petróleos de Venezuela S.A. (“PDVSA”) will move this Court, before the Hon. Denise L. Cote, United States District Judge, for an order staying proceedings against it pending PDVSA’s appeal from this Court’s Opinion and Order of June 21, 2012 to the United States Court of Appeals for the Second Circuit.

Respectfully submitted,

By: /s/ Lawrence H. Martin

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Dated: July 27, 2011

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Notice of Motion for Stay of Proceedings Pending Appeal and Defendant Petróleos de Venezuela S.A.'s Memorandum of Law in support thereof were served electronically by the Court's ECF system, and by first class mail on those parties not registered for ECF pursuant to the rules of this court.

Dated: July 27, 2012

/s/ Lawrence H. Martin  
Lawrence H. Martin